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Attorney for: Quantum3 Group, LLC, as agent for MOMA Trust LLC,
an assignee of Sierra Auto Finance
JM-5630

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)
GIRVISH PHELPS) Case No. 19-16308 (ABA)
Chapter 13
OBJECTION TO CONFIRMATION

Quantum3 Group, LLC, as agent for MOMA Trust LLC, an
assignee of Sierra Auto Finance ("Quantum3"), a secured
creditor of the Debtor, objects to the Debtor's Modified
Plan for the following reasons:

- a. Quantum3 objects to the Debtor's proposal to cure post-petition arrears through his Chapter 13 Plan. The Debtor is bound by the terms of the Plan confirmed on October 10, 2019, which provided that only pre-petition arrears are to be cured through the Plan, with post-petition payments to be made directly to Quantum3 by the Debtor.

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b. Quantum3 credit reserves the right to object to the
feasibility and good faith of this Plan and filing.

/s/ William E. Craig

William E. Craig, attorney for
Quantum3 Group, LLC, as agent for
MOMA Trust LLC, an assignee of Sierra
Auto Finance

Date: 3-17-21